

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

ANTHONY CARLTON DUNLAP, SR.,)
Plaintiff,)
vs.) Case No. 17-03120
GREENE COUNTY JUSTICE)
CENTER, et al.)
Defendants.)

**DEFENDANT Lt. JENKINS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S
INTERROGATORIES OF OCTOBER 4, 2017**

COMES NOW Defendant Lt. Jenkins, by and through counsel Keck & Austin, LLC and submits the following objections and answers to Plaintiff's Interrogatories of October 4, 2017:

This Defendant has attached a copy of Plaintiff's Interrogatories of October 4, 2017, marked as Ex. 1, and incorporates those as if fully stated herein, in lieu of typing them.

This Defendant objects to the instruction portion of the interrogatories as being outside the scope of permissible discovery and not authorized by any Federal Rule of Civil Procedure. Further, this Defendant is under no obligation to affirmatively seek and obtain information solely to assist Plaintiff in litigation, and also cannot speculate as to what facts Plaintiff believes may be “relevant to the conduct described in these interrogatories.” In further response to each enumerated Interrogatory:

1. I would have to refer to the records.
2. I would have to refer to the records.
3. I would have to refer to the records.
4. Objection, vague and calls for Defendant to speculate as to Plaintiff's meaning as to which cell transfer Plaintiff is referring to, and Plaintiff's intent regarding "penological interest." Further, assumes disputed facts, in that this Defendant was not involved in assigning Plaintiff to every cell assignment/suicide watch.
5. Objection. This interrogatory is vague and calls for Defendant to speculate as to Plaintiff's meaning as to which cell transfer Plaintiff is referring to, and Plaintiff's intent regarding "penological interest." Further, assumes disputed facts, in that this Defendant was not involved in assigning Plaintiff to every cell assignment/suicide watch.
6. Objection to "notify," and this interrogatory calls for Defendant to assume disputed facts. Plaintiff has claimed he suffers from various chronic ailments, but is certainly not "disabled."
7. If so, then that is probably a correct paraphrasing.

KECK & AUSTIN, L.L.C.

By /s/ Damon S. Phillips
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[Handwritten signatures and initials over the signature block]

DEFENDANT ATCHISON'S RESPONSES TO PLAINTIFF'S INTERROGATORIES OF
NOVEMBER 6, 2017

COMES NOW Defendant Atchison, by and through counsel Keck & Austin, LLC and submits the following answers to Plaintiff's Interrogatories of November 6, 2017:

This Defendant has attached a copy of Plaintiff's Interrogatories of November 6, 2017, marked as Ex. 1, and incorporates those as if fully stated herein, in lieu of typing them.

In further response to each enumerated Interrogatory:

1. I have no specific memory of being called to C-pod, but jail medical records document that I responded to C-pod and plaintiff's cell on that date.
2. I remember plaintiff claimed he fell, but otherwise would have to refer to the records.
3. I do not specifically recall.
4. I do not specifically recall.
5. I do not specifically recall.
6. I do not believe so, if there was an obvious injury or the assessment was not in normal limits, I would have.

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7. I do not recall, but my documentation indicated he was in the process.
8. We do not distinguish between "boats" and "bottom bunks."
9. We only distinguish between to tier and lower tier.

KECK & AUSTIN, L.L.C.

By /s/ Damon S. Phillips

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Attorneys for Defendants

CERTIFICATE OF MAILING

The undersigned hereby certifies that a true and accurate copy of the foregoing Defendant Atchison's Responses to Plaintiff's Interrogatories of November 6, 2017 was forwarded to plaintiff by U.S. First Class postage pre-paid, this 14th day of November, 2017 to:

Anthony Carlton Dunlap, Sr. #2958346
Greene County Justice Center
1000 N. Boonville
Springfield, MO 65802

/s/ Damon S. Phillips

Damon S. Phillips

GREENE COUNTY JUSTICE CENTER
1000 N Boonville
Springfield MO. 65802

John C. Dunlap SR.
Inmate Name



Court Clerk
United States District Court
Western District of Missouri
400 E. 9th St.
Kansas City, MO 64106

INDIGENT